

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**REED ELSEVIER INC.**

**Plaintiff,**

**v.**

**TRANSUNION HOLDING COMPANY, INC.**

**Defendant.**

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**CIVIL ACTION NO. 13cv8739**

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**SUPPLEMENTAL DECLARATION OF ARMANDO ESCALANTE**

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I, Armando Escalante, declare as follows pursuant to 28 U.S.C. § 1746:

1. I have personal knowledge of all of the facts set forth in this Declaration.
2. I submit this Supplemental Declaration in the above-captioned litigation in support of TransUnion Holding Company, Inc.'s opposition to Plaintiff's request for injunctive relief.
3. As Chief Technology Officer of the Risk Solutions Division of Reed Elsevier Inc.'s subsidiary LexisNexis, I was not charged with – nor did I have any involvement with – selling LexisNexis' services to prospective and/or existing customers.
4. At no point during my employment with LexisNexis did I participate in a sales call for a prospective or existing LexisNexis customer, either in person or over the phone.
5. Rather, all sales at LexisNexis were made through an extensive workforce of inside and outside sales employees across the country, who along with marketing employees worked together to make sales to prospective and existing LexisNexis customers. LexisNexis

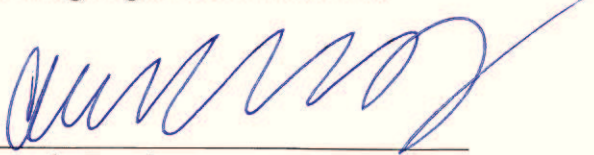
also had a special group of sales employees who were charged with making sales to larger, strategic national accounts.

6. As Chief Technology Officer, I played absolutely no role in LexisNexis' sales process. I was not part of the sales or marketing organizations at LexisNexis.

7. I similarly never served as a point of contact for any LexisNexis customer or prospective customer, nor did I develop any relationship with any LexisNexis customer or prospective customer.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 2, 2014.

  
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Armando Escalante